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*Attorneys for Debtors and Reorganized
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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** ALL PAPERS SHALL BE FILED IN THE LEAD
CASE, NO. 19-30088 (DM).*

Case Nos. 19-30088 (DM)
(Lead Case) (Jointly Administered)

**MOTION FOR ENTRY OF AN ORDER
FURTHER EXTENDING DEADLINE
FOR THE REORGANIZED DEBTORS
TO OBJECT TO CLAIMS AND FOR
RELATED RELIEF**

Hearing Date: November 9, 2021
Time: 10:00 a.m. (Pacific Time)
Place: (Tele/Videoconference Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

**Objection Deadline:
November 2, 2021, 4:00 pm (PT)**

1 **PLEASE TAKE NOTICE** that on January 29, 2019, PG&E Corporation and Pacific Gas
2 and Electric Company (collectively, the “**Debtors**” or “**Reorganized Debtors**”) filed voluntary
3 cases for relief under chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court
4 for the Northern District of California (the “**Bankruptcy Court**”). On June 20, 2020, the
5 Bankruptcy Court confirmed the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of
Reorganization Dated June 19, 2020* [Dkt. No. 8048] (as may be modified, supplemented, or
amended from time to time, and together with all schedules and exhibits thereto, the “**Plan**”). The
Plan became effective on July 1, 2020.

6 **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold a hearing on
7 **November 9, 2021, at 10:00 a.m. (Pacific Time)** (the “**Omnibus Hearing**”) before the Honorable
8 Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Seventh
Amended General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, effective
9 June 28, 2021, and until otherwise ordered, **all hearings shall be conducted by video or
teleconference. The Courtroom will be closed.** All interested parties should consult the
10 Bankruptcy Court’s website at www.canb.uscourts.gov for information about court operations
11 during the COVID-19 pandemic. The Bankruptcy Court’s website provides information regarding
12 how to arrange a telephonic or video appearance. If you have any questions regarding how to appear
at a court hearing, you may contact the Bankruptcy Court by calling 888-821-7606 or by using the
Live Chat feature on the Bankruptcy Court’s website.

13 **PLEASE TAKE FURTHER NOTICE** that, in addition to any other matters to be heard at
14 the Omnibus Hearing, the Bankruptcy Court is scheduled to hear the *Motion for Entry of an Order
Further Extending Deadline for the Reorganized Debtors to Object to Claims and for Related Relief*,
filed by the Reorganized Debtors on October 19, 2021 [Dkt. No. 11450] (the “**Motion**”).

15 **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Motion
16 must be in writing, filed with the Bankruptcy Court, and served on the counsel for the Reorganized
17 Debtors at the above-referenced addresses so as to be received by no later than **4:00 p.m. (Pacific
Time) on November 2, 2021**. Any oppositions or responses must be filed and served on all
18 “Standard Parties” as defined in, and in accordance with, the *Second Amended Order Implementing
Certain Notice and Case Management Procedures* entered on May 14, 2019 [Dkt No. 1996] (the
19 “**Case Management Order**”). **Any relief requested in the Motion may be granted without a
hearing if no opposition is timely filed and served in accordance with the Case Management
Order.** In deciding the Motion, the Court may consider any other document filed in these
20 Chapter 11 Cases and related Adversary Proceedings.

21 **PLEASE TAKE FURTHER NOTICE** that copies of the Motion and its supporting papers
22 can be viewed and/or obtained: (i) by accessing the Court’s website at
23 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors’ notice and claims agent, Prime
24 Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for
U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:
25 pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the
Bankruptcy Court’s website.

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1 Dated: October 19, 2021

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2
3 /s/ Jane Kim

Jane Kim

4 *Attorneys for Debtors and Reorganized Debtors*